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Attorney for Defendant Christine DeNoyo

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

JAMES BURT, an individual,	) Case No. 6:14-cv-01098-AA
	)
Plaintiff,	) DECLARATION OF
	) CHRISTINE DENOYO
v.	) (nka CHRISTINE JORDAN)
	)
CHRISTINE DENOYO, an individual,	)
	)
Defendant,	)
	)
and	)
	)
KEY TRADING LLC, a Delaware limited	)
liability company; RAFAEL DENOYO, an	)
individual; DAVID SULLIVAN, an	)
individual; PETER LARKIN, an individual,	)
	)
Judgment Defendants.	)

I, Christine Jordan, hereby declare under the penalty of perjury that the following is true and correct based upon my personal knowledge.

DECLARATION OF CHRISTINE DENOYO - Page 1

1. I am the defendant in the above captioned case.
2. I was previously married to Rafael deNoyo ("deNoyo").
3. deNoyo and I were divorced in June 2000.
4. In our divorce, deNoyo was ordered to pay me \$2,012 per month as child support and \$1,000 per month in spousal support until 2008 and to maintain medical and dental insurance for our minor children.
5. I was aware that deNoyo was fiscally irresponsible.
6. After our divorce, I allowed deNoyo to deposit funds into my personal checking account to facilitate receipt of moneys owed me as ordered by the Judgment of Dissolution.
7. The only money that I withdrew from the account was money he owed me pursuant to our divorce.
8. To the best of my knowledge, the only money deposited into my account was money deNoyo earned as salary.
9. I communicated with deNoyo by phone and email. My email contact with deNoyo was infrequent.
10. All email contact between deNoyo and myself prior to October 4, 2011, was through my SoftHome account, email address [cjjordan@softhome.net](mailto:cjjordan@softhome.net).
11. All email contact between deNoyo and myself after October 15, 2011, was through my Gmail account, email address [cjjordan97303@gmail.com](mailto:cjjordan97303@gmail.com).
12. I stopped using my SoftHome email account once I moved over to my Gmail account in October of 2011.

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13. In late 2014 or early 2015, my attorney, Mr. Trautman, asked me to produce emails to and from myself and Mr. DeNoyo. At that time, I opened my GMail account and did a search for Rafael DeNoyo's name and found approximately twelve (12) emails from that search. I created a new subfolder in my Gmail account labeled "Rafael." I placed the approximately twelve (12) emails that resulted from my search into that subfolder. During that process, I accidentally deleted those emails.

14. I did not purposely delete these emails.

15. I immediately notified my counsel, Mr. Trautman, and informed him of my mistake.

16. I then asked deNoyo to search and print any emails to or from me.

17. In January 2015, he produced 65 emails to and from me. Those emails are attached as Exhibit A to deNoyo's declaration and include 11 emails from my GMail account. To the best of my knowledge, those 11 emails are the same emails that I accidentally deleted.

18. I did not access my SoftHome account from October 2011 to February 2015.

19. Following my deposition on January 22, 2015, I accessed my SoftHome account on or about February 5, 2015, to determine whether there were any emails to or from deNoyo as requested by Mr. Seibert during my deposition. I did not find any emails to or from deNoyo. I did find a number of spam emails which I deleted. The deleted spam emails were all dated 2012 and later.

20. I was ordered by the Court to produce my electronic devices for inspection. I produced three cell phones and my Ipad for inspection in July of 2015. I understood the purpose of the inspection was to recover the Gmail emails that I accidentally deleted.

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21. I share my iPad with my family. My husband and my grandchildren regularly use my iPad.

22. I did not intentionally or otherwise delete my Internet history from any of my devices prior to the inspection of my electronic devices in July of 2015.

23. I have never been asked to preserve or otherwise document my Internet history.

24. Neither Mr. Trautman nor my current counsel, Mr. Bons, have asked me to delete any electronically-stored information from either an email account or from an electronic device.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED this 5th day of January, 2016.

By: /s/ Christine Jordan  
Christine Jordan

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